Headquarters U.S. Air Force

Integrity - Service - Excellence

SIP Process: Getting Involved

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OVERVIEW

- General Conformity
- SIPs
- DoD Involvement in SIP Process
  - Navy
  - Marines
  - Air Force

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General Conformity

- **General Conformity regulations require federal facilities to demonstrate an action "conforms" with a SIP before going ahead with the action. (40 CFR 93 and 40 CFR 51, Subpart W)**
- **Applies to non-attainment and maintenance areas**
- **Applies to all types of sources, i.e., mobile, stationary, area**

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General Conformity - Impacts

- **Actions that exceed de minimis levels trigger requirement to conduct conformity determination**
- **Mitigation measures may need to be implemented**
- **Emission Reduction Credits may have to be purchased**
- **Limits ability of bases to expand**

SIPs

- **Required to be developed by states to attain/maintain compliance with the federal National Ambient Air Quality Standards (NAAQS)**
- **In the SIP process, states establish SIP budgets that (1) allow for growth in a state and (2) enable a state to make progress toward attaining a particular federal NAAQS**
- **Military installation emissions accounted for in SIPs automatically "conform"**
- **Getting involved in SIP process can ensure growth at a military installation is built into a SIP**
- **From state's perspective, involvement of military in SIP process results in a more accurate SIP**

SIPs

- **Getting involved in SIP process would involve:**
  - **Working closely with state regulators**
  - **Planning, because states develop/revise SIPs infrequently**
  - **Providing a state with emissions data for all types of emissions that occur at an installation**
    - **Mobile and area sources**
    - **Would need to keep emissions data up-to-date**
  - **Projecting expected growth at an installation**
    - **Strategic planning documents**
    - **Major Command data and involvement**
  - **Tracking projects and amount of SIP budget used**

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Navy/Marine Corps Experience

- Navy (Navy Region Southwest) and Marine Corps met with CARB in Jan 2001
- Met with several southern California Air Pollution Control Districts and EPA Region 9
  - EPA 9, CARB, and Districts were all supportive
- Marine Corps installations in San Diego join effort in Sep 2001
- Navy, Marine Corps provided 4 weeks to provide baseline emissions data and growth projections

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Navy/Marine Corps Experience

- **Baseline and growth projection data included:**
  - **Aircraft**
  - **Aerospace Ground Support Equipment**
  - **Military tactical vehicles**
- **Baseline emissions data was reliant on planning documents, inventories, studies, etc.**
- **Negotiated a growth percentages for unanticipated projects**
  - **Ranged between 1% and 4.4%**

Air Force Experience (McGuire AFB)

- McGuire established SIP budgets for NOx, VOCs in 1996
- Like Navy and Marine Corps, McGuire worked with NJ DEP to establish SIP budgets to ensure future growth accounted for in NJ ozone SIP
- Proposed beddown 12 C-17s fits within the base's NOx SIP budget, but resulting headroom in the budget was a concern.
- Base wanted an increase in its NOx SIP budget
- Asked REO Atlanta for assistance

Air Force Experience (McGuire AFB)

- **Proposal: Base sought to transfer 200 tpy emissions from the base's VOC SIP budget to its NOx SIP budget**
- **In Jun 2002, REO worked to gain DEP approval of the proposal and negotiated a reasonable transfer ratio of 1.04 tpy VOC for 1 tpy NOx**
- **Proposed SIP budget transfer included in NJ's next ozone SIP revision in Jan 2003**
- **Went through public comment at state and EPA levels**

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Air Force Experience (McGuire AFB)

- **EPA approved of NJ's SIP revisions, including transfer, in Jul 2003**
- **Result: NOx SIP budget will be increased by 200 tpy effective 2005, i.e., once C-17 beddown is completed**
- **200 tpy increase equates to ability of base to add an additional 30+ aircraft, including support equipment**
- **Key to success of the initiative: Pollution prevention (VOC reductions)**

Air Force Experience (McGuire AFB)

- **Success of the initiative enabled base to avoid costly option of purchasing ERCs**
  - **200 tpy of ERCs would have cost between $500,000 and $1.65 million**
- **McGuire Wing Commander, Col. J.J. Jackson:**

  “The extra room in the budget is a huge win for McGuire. Not only does it ensure the environmental success of the new C-17 beddown, but it also gives us room for growth, so critical for our future success.”

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SIP Budget Process: Lessons Learned

- **Need to work with state far enough in advance to ensure participation in next SIP revision**
- **Determine state's schedule for revising or developing SIP**
- **Participation in SIP process would require an installation to keep its emissions inventory (stationary, mobile, area) updated**
- **Keep plans for projected growth up-to-date and keep them handy for future use**

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SIP Budget Process: Lessons Learned

- **Projection for reasonable growth should be based on strong data**
- **New 8-hour standard provides good/timely opportunity to get involved in SIP process**

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Questions?

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